UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

Michael Kwiatkowski CULLEN AND DYKMAN LLP 100 Quentin Roosevelt Boulevard Garden City, New York 11530

T: (516) 357-3700 F: (516) 357-3792

mkwiatkowski@cullenllp.com

and

Russell R. Johnson III
John M. Craig
Law Firm of Russell R. Johnson III, PLC
2258 Wheatlands Drive
Manakin-Sabot, Virginia 23103
T: (804) 749-8861
russell@russelljohnsonlawfirm.com
jcraig@russelljohnsonlawfirm.com

Co-Counsel for American Electric Power, et al.,

In re: Chapter 11

BED BATH & BEYOND INC., et al., Case No. 23-13359 (VFP)

Debtors.¹ (Jointly Administered)

APPLICATION FOR ADMISSION OF JOHN M. CRAIG PRO HAC VICE

The undersigned hereby seeks an Order granting the admission pro hac vice of John M.

Craig of the Law Firm of Russell R. Johnson III, PLC to practice before this Court in connection

¹ The last four digits of Debtor Bed Bath & Beyond Inc.'s tax identification number are 0488. A complete list of the Debtors in these Chapter 11 Cases and each such Debtor's tax identification number may be obtained on the website of the Debtors' claims and noticing agent at https://restructuring.ra.kroll.com/bbby. The location of Debtor Bed Bath & Beyond Inc.'s principal place of business and the Debtors' service address in these Chapter 11 Cases is 650 Liberty Avenue, Union, New Jersey 07083.

with the above-captioned bankruptcy case and any adversary proceedings therein (collectively, the "Matters"). This application (the "Application") is submitted pursuant to Rule 9010-1 of the Local Rules of the United States Bankruptcy Court for the District of New Jersey. Unless requested by other parties, no oral argument is requested. A proposed form of Order is attached. In support of the Application, Michael Kwiatkowski hereby represents as follows:

1. I am an attorney with Cullen and Dykman LLP, which law firm maintains offices, among other places, at 433 Hackensack Avenue, Hackensack, New Jersey 07601. Cullen and Dykman LLP has been retained to serve as local counsel for American Electric Power, Arizona Public Service Company, Georgia Power Company, Salt River Project, San Diego Gas and Electric Company, Southern California Edison Company, The Cleveland Electric Illuminating Company, Toledo Edison Company, Ohio Edison Company, Pennsylvania Power Company, Monongahela Power Company, Potomac Edison Company, West Penn Power Company, Jersey Central Power & Light Company, The Connecticut Light & Power Company, Yankee Gas Service Company, Public Service Company of New Hampshire, Eversource Gas of Massachusetts, NStar Electric Company, Western Massachusetts, Tampa Electric Company, Peoples Gas System, Inc., Rochester Gas & Electric Corporation, PSEG Long Island, Tucson Electric Power Company, UNS Gas, Inc., Consolidated Edison Company of New York, Inc., Baltimore Gas and Electric Company, Florida Power & Light Company, Boston Gas Company, Colonial Gas Cape Cod, KeySpan Energy Delivery Long Island, KeySpan Energy Delivery New York, Massachusetts Electric Company, Narragansett Electric Company, Niagara Mohawk Power Corporation, Virginia Electric and Power Company d/b/a Dominion Energy Virginia, The East Ohio Gas Company d/b/a Dominion Energy Ohio, PECO Energy Company, Delmarva Power & Light Company, Atlantic City Electric Company, NV Energy, Inc., Public Service

Electric and Gas Company, New York State Electric and Gas Corporation and Commonwealth Edison Company (collectively, the "Utilities") in connection with the Matters.

- 2. I am an attorney-at-law of the State of New Jersey, and I am admitted to practice before the District Court of New Jersey.
- 3. I submit this Application, pursuant to Civ. Rule 101.1(c) of the Local Rules of the United States District Court for the District of New Jersey and Rule 9010-1 of the Local Rules of Bankruptcy Practice for the United States Bankruptcy Court for the District of New Jersey, in support of an *Order Approving Admission, Pro Hac Vice, of John M. Craig*.
- 4. Mr. Craig is an attorney with the Law Firm of Russell R. Johnson III, PLC which maintains an address of 2258 Wheatlands Drive, Manakin-Sabot, VA 23103.
- 5. Attached is a certification of Mr. Craig in which he certifies that he has been admitted to the bar of the State of Virginia since 1991 and the bar of the District of Columbia since 1992. He also certifies that he has been admitted to practice in the following courts: U.S. Court of Appeals for the Fourth Circuit (1992); U.S. District Court for the Eastern District of Virginia (1992); U.S. District Court for the District of Columbia (2000); U.S. Bankruptcy Court for the Eastern District of Virginia (1992); and U.S. Bankruptcy Court for the Western District of Virginia (2005).
- 6. Mr. Craig further certifies that he is, and has remained, a member in good standing of said bar at all times, that no disciplinary proceedings are pending against him in any jurisdiction and no discipline has previously been imposed on him in any jurisdiction.
- 7. Mr. Craig is familiar with the circumstances surrounding the Matters and applicable facts and law, and his presence will serve the best interests of the Utilities.

WHEREFORE, Applicant respectfully requests entry of the Order submitted herewith approving the admission, *pro hac vice*, of John M. Craig to represent the Utilities as primary counsel in connection with the Matters.

Dated: Garden City, New York May 8, 2023

CULLEN AND DYKMAN LLP

By: /s/ Michael Kwiatkowski
Michael Kwiatkowski
100 Quentin Roosevelt Boulevard
Garden City, New York 11530
T: (516) 357-3700
F: (516) 357-3792
mkwiatkowski@cullenllp.com

and

John M. Craig
Law Firm of Russell R. Johnson III, PLC
2258 Wheatlands Drive
Manakin-Sabot, Virginia 23103
T: (804) 749-8861
jcraig@russelljohnsonlawfirm.com

Co-Counsel for American Electric Power, Arizona Public Service Company, Georgia Power Company, Salt River Project, San Diego Gas and Electric Company, Southern California Edison Company, The Cleveland Electric Illuminating Company, Toledo Edison Company, Ohio Edison Company, Pennsylvania Power Company, Monongahela Power Company, Potomac Edison Company, West Penn Power Company, Jersey Central Power & Light Company, The Connecticut Light & Power Company, Yankee Gas Service Company, Public Service Company of New Hampshire, Eversource Gas of Massachusetts, NStar Electric Company, Western Massachusetts, Tampa Electric Company, Peoples Gas System, Inc., Rochester Gas & Electric Corporation, PSEG Long Island, Tucson Electric

Power Company, UNS Gas, Inc., Consolidated Edison Company of New York, Inc., Baltimore Gas and Electric Company, Florida Power & Light Company, Boston Gas Company, Colonial Gas Cape Cod, KeySpan Energy Delivery Long Island, KeySpan Energy Delivery New York, Massachusetts Electric Company, Narragansett Electric Company, Niagara Mohawk Power Corporation, Virginia Electric and Power Company d/b/a Dominion Energy Virginia, The East Ohio Gas Company d/b/a Dominion Energy Ohio, PECO Energy Company, Delmarva Power & Light Company, Atlantic City Electric Company, NV Energy, Inc., Public Service Electric and Gas Company, New York State Electric and Gas Corporation and Commonwealth Edison Company